

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE PLAID INC. PRIVACY LITIGATION

Master Docket No.: 4:20-cv-03056-DMR

**DECLARATION OF DENISE EARLE OF
ANGEION GROUP, LLC RE: POST-
DISTRIBUTION ACCOUNTING**

I, Denise Earle, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

20 1. I am a Senior Project Manager at the class action notice and settlement
21 administration firm, Angeion Group, LLC (“Angeion”). I am over 21 years of age and am not a
22 party to this action. I am fully familiar with the facts contained herein based upon my personal
23 knowledge.

24 2. Angeion was retained to serve as the Settlement Administrator to, among other tasks,
25 distribute payments to valid claims and perform other duties as specified in the Class Action
26 Settlement Agreement (“Agreement”).

1 3. Pursuant to the United States District Court, Northern District of California's
 2 Procedural Guidance for Class Action Settlements, Angeion submits the following Post-
 3 Distribution Accounting Report following closure of the distribution period:

Settlement Details	
Total Settlement Fund	\$58,000,000
Approximate number of Class Members	98,000,000

Notice Details	
Methods of notice to Class Members	Email, postcard, custom social media, digital and social media, paid search campaign, sponsored class action website listings
Number of Class Members to whom email notice was sent	60,271,546
Number of Class Members to whom email notice was sent and not returned as undeliverable	58,787,099
Number of Class Members to whom postcard notice was sent	650,669
Number of postcards re-mailed to forwarding address or to an address located through skip-tracing	44,749
Number of Class Members to whom postcard notice was sent and not returned as undeliverable	633,219
Number of clicks-throughs on all digital noticing ads in initial campaign + reminder campaign	334,516

Claim Forms, Exclusions, and Objections		
Number and Percentage of Valid Claims	#: 1,198,327	%: 1.22
Number and Percentage of Opt Outs	#: 1,774	%: 0.0018
Number and Percentage of Objections	#: 5	%: 0.000005

Settlement Payment Details		
Recovery per claimant (pro rata share of Net Settlement Fund)		\$35.97
Methods of payment to Class Members	ACH, PayPal, Venmo, and Mailed Check via USPS	
Number of successful digital payments distributed		965,863
Value of successful digital payments		\$34,742,092.11
Number of physical checks distributed ¹		232,363
Number of checks cashed		187,744
Value of cashed checks		\$6,753,151.68
Number of checks uncashed		44,619
Value of checks uncashed		\$1,604,945.43
Administrative costs		\$3,935,528.56
Total court-approved service awards to Class Representatives	\$55,000 (\$5,000 per Class Representative)	
Court-awarded costs and expenses		\$115,920.21
Court-awarded attorneys' fees		\$11,000,000.00

¹ Physical checks were distributed to Authorized Claimants who opted to receive a paper check in the first instance, as well as to Authorized Claimants who opted to receive a digital payment but for whom the digital payment was not successful.

1 4. As of August 21, 2023, accounting for all expenses, a total of \$1,516,834.18 remains
 2 in the Settlement Fund.

3 5. A second distribution to Authorized Claimants is not economically feasible in my
 4 professional opinion. Angeion estimates the administrative cost to effectuate a second round of
 5 payments to the 1,198,327 Authorized Claimants would be approximately \$572,813.00. After
 6 deducting anticipated administration costs, there would be approximately \$944,021.18 remaining
 7 in the Settlement Fund that could be distributed to Authorized Claimants. The pro rata payment
 8 amount would be approximately \$0.78 per Claimant, as reflected in the chart below. It has been
 9 Angeion's general experience that lower check amounts often result in a higher percentage of
 10 uncashed checks, as Class Members are less motivated to cash/negotiate a check for that lower
 11 amount. Furthermore, the costs associated with distributing the payments would surpass the actual
 12 value of the payment itself. In light of this, Angeion has recommended to the Parties that a second
 13 distribution is not economically feasible and recommends the remaining funds be distributed pro
 14 rata to the Cy Pres Recipient(s).

Total Amount Remaining in the Settlement Fund	\$ 1,516,834.18
Approximate Administrative Costs to Effectuate a Second Distribution	\$ (572,813.00)
Approximate Total Remaining in the Settlement Fund for a Second Distribution	\$ 944,021.18

Second Distribution Pro Rata Settlement Benefit	
1,198,327 Payments @ \$0.78	\$ 934,695.06
Rounding Variance (Undistributed)	\$ 9,326.12

23 I hereby declare under penalty of perjury that the foregoing is true and correct.

24
 25 Dated: August 21, 2023


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 DENISE EARLE